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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

Michael Katz-Lacabe and Dr. Jennifer
Golbeck, on behalf of themselves and all
others similarly situated,

Plaintiffs,

vs.

ORACLE AMERICA, INC., a corporation
organized under the laws of the State of
Delaware,

Defendant.

Case No. 3:22-cv-04792-RS

**STIPULATION AND ORDER TO EXTEND
CASE DEADLINES**

Judge: Hon. Richard Seeborg

Date Action Filed: August 19, 2022
Trial Date: None set

Pursuant to Civil Local Rule 6-2(a), Plaintiffs Michael Katz-Lacabe and Dr. Jennifer Golbeck (“Plaintiffs”) and Defendant Oracle America, Inc. (“Oracle”), by and through their attorneys of record, stipulate as follows:

WHEREAS, on November 17, 2023, Plaintiffs filed the Second Amended Complaint

1 (“SAC”) (ECF No. 87);

2 WHEREAS, on December 22, 2023, Oracle filed a motion to dismiss the SAC (“Motion”)
3 (ECF No. 88);

4 WHEREAS, on March 18, 2024, the parties completed briefing Oracle’s Motion (ECF No.
5 101);

6 WHEREAS, the hearing on the Motion is scheduled for March 28, 2024 (ECF No. 95);

7 WHEREAS, the parties met and conferred on March 21 and 22, 2024, and have agreed to
8 formally mediate this matter and agree that an extension of the class certification schedule will
9 facilitate that process;

10 WHEREAS, the parties acknowledge and agree that they may seek a further extension of
11 the class certification schedule if circumstances so warrant;

12 WHEREAS, Plaintiffs’ motion for class certification and class expert reports are currently
13 due on or before May 1, 2024, Oracle’s opposition thereto and expert reports are due on or before
14 June 25, 2024, and Plaintiffs’ reply in support and rebuttal expert reports, if any, are due on or
15 before July 23, 2024, with the motion to be heard on August 8, 2024 (ECF No. 83);

16 WHEREAS, the parties agreed, in light of the foregoing, to extend the deadline for Plaintiffs
17 to file their motion for class certification (Declaration of Michael W. Sobol (“Sobol Decl.”) ¶¶ 4–
18 5);

19 WHEREAS, the parties have previously stipulated five times to extend deadlines in this
20 case (ECF Nos. 21, 50, 52, 59, 82), each of which the Court approved (ECF Nos. 22, 51, 53, 60,
21 83) (Sobol Decl. ¶ 6);

22 NOW THEREFORE, the parties hereby stipulate and agree, subject to the approval of the
23 Court, that:

24 1. Plaintiffs shall file their motion for class certification and class expert reports on or
25 before October 1, 2024;

26 2. Oracle shall file its opposition to Plaintiffs’ motion for class certification and class
27 expert reports on or before November 26, 2024;

3. Plaintiffs shall file any reply to Oracle’s opposition and rebuttal class expert reports, if any, on or before December 23, 2024; and

4. Plaintiffs shall notice their motion for class certification on January 16, 2025, at 1:30 p.m., or on a date or time otherwise directed by the Court.

Dated: March 25, 2024

MORRISON & FOERSTER LLP

By: /s/ Purvi G. Patel

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Attorneys for Defendant

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Dated: March 25, 2024

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By: /s/ Michael W. Sobol

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ATTESTATION

Pursuant to Civil Local Rule 5.1 regarding signatures, I attest that concurrence in the filing of this document has been obtained from the other signatories

Dated: March 25, 2024

By: /s/ Michael W. Sobol
Michael W. Sobol

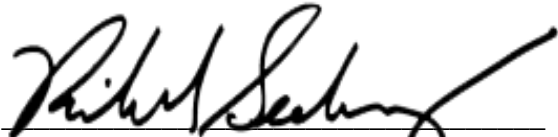
ORDER

Pursuant to the parties' stipulation, the Court hereby orders that:

1. Plaintiffs shall file their motion for class certification and class expert reports on or before October 1, 2024;
2. Oracle shall file its opposition to Plaintiffs' motion for class certification and class expert reports on or before November 26, 2024;
3. Plaintiffs shall file any reply to Oracle's opposition and rebuttal class expert reports, if any, on or before December 23, 2024; and
4. Plaintiffs shall notice their motion for class certification on January 16, 2025, at 1:30 p.m., or on a date or time otherwise directed by the Court.

IT IS SO ORDERED.

Dated: March 25, 2024


U.S. District Court Judge Richard Seeborg